

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company d/b/a Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the Frost Bridge to Campville 115-kilvolt (kV) electric transmission line project that traverses the municipalities of Watertown, Thomaston, Litchfield, and Harwinton, which consists of (a) construction, maintenance and operation of a new 115-kV overhead electric transmission line entirely within existing Eversource right-of-way and associated facilities extending approximately 10.4 miles between Eversource's existing Frost Bridge Substation in the Town of Watertown and existing Campville Substation in the Town of Harwinton; (b) related modifications to Frost Bridge Substation and Campville Substation; and (c) reconfiguration of a 0.4-mile segment of two existing 115-kV electric transmission lines across the Naugatuck River in the towns of Litchfield and Harwinton within the same existing right-of-way as the new 115-kV transmission line.

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POST-HEARING BRIEF OF
EVERSOURCE ENERGY

The Connecticut Light and Power Company
d/b/a Eversource Energy

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TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION AND SUMMARY.....	1
STATEMENT OF THIS PROCEEDING.....	3
DISCUSSION.....	
CONCLUSION.....	

INTRODUCTION AND SUMMARY

The Frost Bridge to Campville 115-kV Electric Transmission Line Project (the “Project”) is the product of more than nine years of planning studies. The Independent System Operator, New England (ISO-NE) issued a technical approval of the improvements proposed in this Project as part of a greater study conducted by an ISO-NE – led Working Group that examined the loss of critical 115-kV sources into four contiguous electrical sub- areas, including the Northwest Connecticut (NWCT) sub-area. The planning studies demonstrated that a new source into NWCT was needed. The Project would bring in a new source from a substation just outside the load pocket (Frost Bridge Substation) to a substation within the load pocket (Campville Substation). This new line will bring the electric supply system in Northwest Connecticut into compliance with applicable regional and national reliability standards and criteria by eliminating potential thermal overloads and voltage violations identified in the planning studies.

No parties or intervenors have questioned the need for this Project, its proposed route, or its estimated cost. Moreover, there is no practical and feasible alternative that would address the reliability problems that this Project resolves, and extensive analysis has shown that the proposed Project is the most cost-effective transmission solution.

The Project will be constructed entirely within an existing 250-400 foot wide right-of-way (“ROW”), which has been devoted to utility use for approximately 90 years, or on Eversource property at both Frost Bridge and Campville substations, which have similarly been in existence for decades. The Proposed Route traverses or borders a

variety of land uses. The new 115-kV line will be constructed alongside existing transmission lines, so that its visual impact will be moderate and incremental. No new substations will be required; all of the necessary terminal improvements will be made at existing substations. Eversource is taking extraordinary care to minimize construction effects on the identified water resources along the route. Clearing and vegetation maintenance along the ROW for the new line will increase scarce scrub/shrub “open field” habitat, with significant beneficial effects for wildlife diversity.

Because Eversource has taken full advantage of available “no-cost” EMF reduction strategies, magnetic field levels at the edges of the existing ROW will not substantially increase, and will decrease in some locations, compared to existing conditions.

The Project would be constructed entirely overhead, except for a 0.1-mile underground section within and adjacent to the Frost Bridge Substation, which is the most cost-effective, environmentally compatible configuration, and is consistent with all of the standards that this Council must apply in ruling on transmission line applications.

The following sections of this brief discuss the foregoing points in more detail.

STATEMENT OF THIS PROCEEDING

The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource” or “Applicant”) has applied to the Connecticut Siting Council (“Council”) for a Certificate of Environmental Compatibility and Public Need for the Frost Bridge to Campville 115-kV electric transmission line project that traverses the municipalities of Watertown, Thomaston, Litchfield, and Harwinton.

As proposed, the Project would consist of the construction, maintenance and operation of a new 115-kV overhead electric transmission line and associated facilities, located entirely within an existing Eversource ROW and extending approximately 10.4 miles between the existing Frost Bridge Substation in the Town of Watertown and the existing Campville Substation in the Town of Harwinton.

Use of Eversource's existing ROWs, where linear utility uses are already established, is consistent with the Federal Energy Regulatory Commission's ("FERC") "Guidelines for the Protection of Natural, Historic, Scenic, and Recreational Values in the Design and Location of Rights-of-Way and Transmission Facilities," as required by Conn. Gen. Stats. § 16-50p(a)(3)(D). (*Council Admin. Notice Item 7*)

In addition, as part of the Project, Frost Bridge Substation and Campville Substation would be modified. All improvements to these substations can be accommodated within the fence lines of the existing Eversource properties, although the fence line at the Campville Substation would require a modest extension (0.4 acre) onto additional land owned by Eversource. The Frost Bridge Substation occupies approximately 5.7 acres of a 128.5-acre property owned by Eversource, and the Campville Substation occupies approximately 1.65 acres of a 42.33-acre property owned by Eversource. Both substations have been in operation for decades.

The Project also calls for a reconfiguration of a 0.4-mile segment of two existing 115-kV electric transmission lines, currently supported on a single set of lattice steel structures, in order to eliminate a double-circuit line contingency. The 1191 and 1921

lines, which cross the Naugatuck River at the border between the towns of Litchfield and Harwinton, would be moved to separate monopole structures.

DISCUSSION

This portion of the Brief summarizes the evidence showing that:

- The Project is needed (Section I);
- The environmental effects of the Project are acceptable (Section II); and
- Overhead construction of the 115-kV transmission line from Frost Bridge Substation to Campville Substation is consistent with the Council's EMF Best Management Practices and with statutory requirements (Section III).

Appendix A to this Brief lists conclusory findings that the Council is directed to make by its enabling legislation in order to issue a certificate, and provides citations to the relevant paragraphs of Eversource's Proposed Findings of Fact that support those findings.

I. THERE IS A PUBLIC NEED FOR THE PROJECT FOR REGIONAL RELIABILITY

A. The Project Is Needed To Ensure Reliable Electric Service To Northwest Connecticut (Conn. Gen. Stats. § 16-50p(a)(3)(A))

1. The Electric System for the Northwest Connecticut Region Is in Violation of Mandatory Reliability Standards, and the Project Will Address These Criteria Violations

This Project is the product of more than nine years of planning studies. A Working Group convened by ISO-NE, consisting of transmission planners from ISO-NE, Eversource, and The United Illuminating Company, conducted a comprehensive analysis of the Greater Hartford and Central Connecticut (GHCC) areas. The GHCC studies

found thermal and voltage criteria violations in the Northwest Connecticut (NWCT) “load pocket”. A load pocket is an area that has insufficient generation and/or transmission to serve its load. The electric system in the NWCT load pocket is subject to overloads when the system attempts to serve peak load under many contingent conditions. The worse-case violations observed were for the loss of two or more import paths in the NWCT sub-area. The NWCT sub-area had three transmission elements with N-1 thermal violations and five Pool Transmission Facilities (PTF) buses with N-1 low-voltage violations. Under N-1-1 conditions, there were ten elements with thermal violations and 12 PTF buses with low voltage violations. Two 115-kV non-PTF buses had N-1-1 voltage violations. Although the study year modelled in GHCC’s *Needs Assessment Report* was 2022, the study showed that the improvements required to meet the identified needs should be constructed as soon as possible. Further, the *2012 Needs Assessment Report* found that the year of need for the NWCT sub-area improvements was 2013 because the Connecticut net load forecast for that year was 7,776 megawatts (MW). Thermal violations began to occur at a net load of 4,225 MW, and low voltage violations began to occur at a net load of 5,694 MW. (*Eversource 1, Vol. 4, Ex.1, p. 13; Eversource 1, Vol. 1, p. 2-12 – 2-14;; PFOF ¶¶ 21-22, 24, 29, 31-33*)

Because the planning studies demonstrated that the worst thermal and voltage violations occurred following the loss of two sources that feed the NWCT load pocket, the Working Group determined that a new source into NWCT was needed. The Working Group’s preferred solution to resolve the thermal and voltage criteria violations found in the study was the addition of a new 10.4 mile, 115-kV line from Frost Bridge to

Campville substations with associated terminal equipment, and separation of 115-kV DCT corresponding to the Frost Bridge to Campville (1191) line and the Thomaston to Campville (1921) line with the addition of a breaker at the Campville Substation. (*Eversource 1, Vol. 4, Ex. 2, p. 86; Eversource 1, Vol. 1, pp. 2-13 – 2-14; PFOF ¶ 34*)

The proposed 115-kV line will bring in a new source from a substation just outside the load pocket to the substation within the load pocket. This new line provides: (1) an additional system element to share the load that is automatically redistributed upon the failure of other system elements; and (2) a source to help maintain continuity of supply to the load from external sources in such an event. With the new 115- kV line in place, the flows on most system elements in the sub-area were reduced sufficiently so that they did not overload in the contingencies modeled in the planning studies. (*Eversource 1, Vol. 1, pp. 2-12 – 2-14; PFOF ¶¶ 34-35*)

The Project also includes the separation of a double-circuit tower line at the Naugatuck River crossing in Litchfield and Harwinton. The separation of the 1191 and 1921 circuits at this location will eliminate low voltage conditions and thermal overloads associated with the loss of both lines as currently configured. Because these lines are both supported on a single set of lattice steel structures at the Naugatuck River crossings, the loss of both lines must be modeled as a single contingency in planning studies. These studies showed that, even with the new 115-kV line, certain design contingencies that include the loss of both the 1191 and 1921 lines will cause voltage violations on several area buses and thermal overloads on other lines in the sub-area. Separation of the 1191/1921 DCT segment will result in each line being supported by its own set of

structures for its entire length, which, together with the addition of a circuit breaker at the Campville Substation, eliminates the voltage violations and overloads associated with the DCT contingency. (*Eversource 1, Vol. 1, pp. 2-13 – 2-14; PFOF ¶¶ 37-39*)

2. *There Has Been No Opposition to the Need for This Project*

The Office of Consumer Council, the only other party to this action, does not oppose the need for the Project. There are no intervenors in this proceeding, and there is simply no challenge to the demonstrated need for the Project. (*Record*)

3. *There Are No Practical System Alternatives That Would Properly Resolve the Reliability Problems Addressed By The Project*

a. No Action

Taking no action would fail to eliminate violations of national and regional liability standards and criteria, and would be inconsistent with Eversource's obligation to provide reliable electric service. (*Eversource 1, Vol. 1, p. 10-1; PFOF ¶ 41*)

b. Transmission Alternatives

Although transmission alternatives were considered as part of the GHCC studies, those alternatives were eliminated in favor of the solution components that make up this Project after a comparison of costs and environmental and social effects. Having determined that the best way to solve the violations in the NWCT sub-area was to provide a new 115-kV source from a substation outside of the sub-area to a substation inside of the sub-area, the Working Group considered what the effective terminal locations of the line should be. The voltage performance of the Frost Bridge to Campville Transmission line is not only superior to that of the other identified alternatives, but it is

also substantially less costly. (*Eversource 1, Vol. 4, Ex. 2; Eversource 1, Vol. 1, pp. 10-4 – 10-5; PFOF ¶ 45*)

In its GHCC Solutions Study, the ISO-NE's Working Group identified two other alternative 115-kV transmission line connections, North Bloomfield to Canton and North Bloomfield to Campville. The North Bloomfield to Campville alternative was quickly eliminated due to its much greater length and associated environmental effects. The overall cost of a North Bloomfield to Canton Line would be approximately \$23 million more than the Frost Bridge to Campville 115-kV line proposed in the Project. Moreover, the transmission line would be 2.3 miles longer, and extend through more densely populated areas and wetlands as compared to the Frost Bridge to Campville transmission line. (*Eversource 1, Vol. 4, Ex. 2; PFOF ¶ 43-45*)

When comparing the transmission alternatives to the proposed transmission line between Frost Bridge Substation and Campville Substation, it is clear that Eversource has chosen the line with the best performance, least cost, and fewest environmental and social impacts for this Project.

c. Non-Transmission System Alternatives

There are no practical non-transmission alternatives to the Project. In some cases, electric reliability needs can be met by means other than improvements to the transmission system. For instance, where the reliability problem is simply a lack of sufficient generation resources to reliably serve the load in a defined area, it may be possible to meet the reliability need through building new generation in the area, reducing demand in the area, or through some combination of these strategies.

In other cases, the only practical means of resolving transmission reliability criteria violations is through improvements to those transmission systems. As an expert from London Economics International, LLC (LEI) by Julia Frayer and Sayad Moudachirou established, this is such a case.

LEI's detailed analysis, presented in their July 27, 2015 report (*See Eversource 1, Vol. 4, Ex. 4*) strongly supports the conclusion that there is no practical and cost-effective non-transmission alternative to the Project. LEI carefully evaluated energy injections, load reductions and combinations of the two, but was unable to find a technically feasible, economically practical non-transmission alternative that solved the thermal and voltage violations identified by ISO-NE in NWCT. Although LEI was able to identify a potential technically feasible non-transmission alternative, the cost for implementing the alternative would be approximately 12 times greater than the Project. Challenges regarding implementation of the non-transmission alternative were also identified in the report, including acquisition of sufficient land for construction, timing and expense of the siting process, and construction of the requisite fuel supply infrastructure. These challenges are not present with the transmission solution presented by this Project. (*Eversource 1, Vol. 4, Ex. 4; PFOF ¶ 48, 51*)

B. The Project Conforms To a Long-Range Plan for Expansion Of The Electric Power Grid of the Electric Systems Serving the State and Interconnected Utility Systems (Conn. Gen. Stats. § 16-50p(a)(3)(D))

In order to grant a certificate for an electric transmission line, the Council must find that “the facility conforms to a long-range plan for expansion of the electric power

grid of the electric systems serving the state and interconnected utility systems”. (*Conn. Gen. Stats. § 16-50p(a)(3)(D)*) There is no doubt that the Project satisfies this requirement.

The proposed Project is an outgrowth of the New England East-West Solution (NEEWS) Plan, which is a comprehensive set of 345-kV improvements to the Southern New England transmission system; and of a series of ISO-NE planning studies of the Greater Hartford and Central Connecticut sub-areas. Ultimately the load serving needs of the Greater Hartford, Manchester-Barbour Hill, Middletown, and NWCT sub-areas were examined together in a single study (the Greater Hartford Central Connecticut Study) to assure that coordinated and cost efficient solutions to the identified needs would be developed. At the same time, ISO-NE was examining transmission needs in SWCT for 2022. The GHCC and SWCT studies were coordinated in an effort to avoid redundant solutions, and together the studies identify solutions for Connecticut’s transmission system that will comply with applicable reliability requirements through 2022. This Project is a key component of a set of transmission improvements in Connecticut coordinated by ISO-NE and is included in its Regional System Plan. (*Applicant Admin. Notice 4, p. 104, Eversource 1, Vol. 1, pp. 2-6, 2-14; PFOF ¶ 21-22, 26, 40*)

C. The Project Will Serve the Public Need for Economic Service And Serve The Interests Of System Economy (Conn. Gen. Stats. § 16-50p(a)(3)(D))

1. The Project Will Provide the Needed Improvements at

the Lowest Reasonable Cost

In designing a solution for the NWCT sub-area, the ISO-NE Working Group consistently identified the electrical solution option that offered the most system benefit at the lowest cost, and with the fewest adverse environmental effects. (*Eversource 1, Vol. 4, Ex. 2*) These studies leave no doubt that a new 115-kV transmission line from Frost Bridge Substation to Campville Substation, with attendant improvements outlined in this Project, is the preferred electrical solution. The Proposed Route for these improvements, which is located entire within an existing Eversource ROW, and the planned transmission line configuration, which will be entirely overhead except for a 0.1-mile underground segment exit from the Frost Bridge Substation, is clearly the most cost-effective, least environmentally damaging practical alternative. (*See generally, Eversource 1, Vol. 1, Vol. 3, Vol. 4; PFOF ¶ 53*)

Because the Project has been designed cost effectively in accordance with good engineering practice, and will yield regional benefit, it is expected that the costs of the Project will be regionalized. Assuming all costs are so regionalized, Connecticut's electricity customers would pay approximately 36% of the Project's costs. (*Eversource 3, p. 17; PFOF ¶ 73*)

2. The Overhead Portions of the Project Are Cost-Effective And the Most Appropriate Alternative Based on a Life-Cycle Cost Analysis of the Facility and Underground Alternatives to It

Section 16-50p(a)(3)(D) of the General Statutes requires that when the Council grants a Certificate, it specify "what part, if any, of the facility shall be located

overhead... and... that the overhead portions, if any, of the facility are cost-effective and the most appropriate alternative based on a life-cycle cost analysis of the facility and underground alternatives to such facility....” Accordingly, a transmission line applicant and the Council must assess the practicality and life-cycle cost of an all-underground alternative to a proposed overhead transmission line. The Record in this matter demonstrates that the development of the new 115-kV line in an all-underground or variation of an all-underground line configuration between Frost Bridge Substation and Campville Substation would not be cost-effective or preferable to the proposed, predominantly overhead line configuration.

Eversource identified and evaluated two potential underground 115-kV cable - system alignments using a combination of existing road ROWs between the two substations – one primarily underground with a 0.2-mile segment of overhead line and the other primarily underground with a 2-mile segment of overhead line. Eversource concluded that each of these alignments would be (i) less reliable, (ii) significantly more costly, and (iii) challenging from both environmental and engineering perspectives. Either route would also add an estimated six to twelve months to the construction period, and would require the acquisition of additional lands for utility use. (*Eversource 1, Vol. 1, p. 11-18; Eversource 3, pp. 19-20; PFOF ¶ 84-85*)

Neither of these all-underground line alternatives would be economically prudent. For the underground line with a 0.2-mile segment overhead, the initial capital cost is estimated to be approximately \$328 million, as compared to \$51 million for the Project. For the underground line with the 2-mile segment overhead, the initial capital cost is

estimated to be approximately \$264 million. The differences in life-cycle costs are even greater. Specifically, the life-cycle cost for the proposed Project is estimated to be \$76 million; for all underground transmission lines, the life-cycle cost is estimated to be \$540 million.¹ (*Eversource 1, Vol. 1, p. 11-27; Eversource 3, p. 20; PFOF ¶¶ 85-86*)

These cost differentials become much greater when the cost to Connecticut ratepayers is considered, because the excess cost of underground line construction, as compared to overhead line construction, must be assumed to be “localized” rather than shared by the entire region. The term “localized” means that Connecticut ratepayers would pay 100% of those incremental costs. However, recovery of project costs through regional rates is not automatic. Only costs determined by ISO-NE to be eligible for regionalization according to specific tariff provisions will be included in regional rates. (*Admin. Notice 8*)

These vast cost differences preclude a finding that a predominantly all-underground line would be more cost-effective, on a life-cycle cost basis, than a predominantly all-overhead line, or that it would be a more appropriate alternative than an overhead line.

II. THE LOCALIZED AND SHORT-TERM ADVERSE ENVIRONMENTAL EFFECTS AND POLICY CONFLICTS OF THE PROPOSED OVERHEAD TRANSMISSION LINE DO NOT JUSTIFY DENIAL OF THE APPLICATION OR AN ORDER THAT THE LINE BE INSTALLED UNDERGROUND (Conn. Gen. Stats. § 16-50p(a)(3)(B)&(C))

Section 16-50p(a)(3)(B) of the General Statutes requires the Council to find, when it issues a certificate, “[t]he nature of the probable environmental impact of the facility

¹ Note that Proposed Finding of Fact No. 86 inaccurately states the life-cycle cost of the underground alternative as \$432 million. As supported by the above citations, \$540 million is correct.

alone and cumulatively with other existing facilities, including a specification of every significant adverse effect, including, but not limited to, electromagnetic fields that, whether alone or cumulatively with other effects, impact on, and conflict with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife;” and § 16-50p(a)(3)(C) requires the Council to find why these effects do not provide “sufficient reason to deny the application.” Electric and magnetic fields, and the visual or scenic implications of structure designs that reduce them, will be discussed in following sections of this Brief. With respect to the other listed environmental concerns, Eversource has provided extensive evidence to demonstrate that the Project’s adverse effects on environmental resources will be, for the most part, short term and localized; that Eversource will exercise great care to mitigate those effects; and that the Project will have significant long-term beneficial environmental effects. This evidence is summarized in detail in Eversource’s Proposed Findings of Fact, *PFOF ¶¶ 112-220*, and will be summarized at a high level here.

A. Substation and Switching Station Modifications

The proposed modifications to Frost Bridge Substation would all occur within the fence lines (i.e., the already developed portions) of the existing station site. Modifications at the Campville Substation would require an expansion of the developed portion of the substation of only approximately 0.4 acre, resulting in an extension of the substation fence by approximately 90 feet to enclose the expansion area. This expansion area would be located on land currently owned by Eversource. As a result, environmental

effects would be minor, localized on-site, or short-term (lasting only for the duration of construction). The incremental changes in the appearance of each facility will be negligible. All of the proposed substation modifications would occur in upland areas and thus would not result in any direct adverse effects on water resources. (*Eversource 1, Vol. 1, pp. 6-42 – 6-43*)

There are no known cultural resource sites (standing historic structures or recorded archaeological sites) in the immediate vicinity of either substation site, and no reason to believe that as yet undiscovered significant cultural resources would be encountered in the previously disturbed station yards and adjacent areas where Project construction will take place. Although the Campville Substation will be expanded, most of the proposed modifications would occur within the fenced substation where soils have been previously disturbed. The potential for locating intact cultural artifacts at either substation site is negligible. (*Eversource 1, Vol. 1, p. 6-45*)

B. Construction and Operation of the New 115-kV Line

In general, the Project ROW extends through less developed or sparsely populated areas that are categorized by segments of rugged terrain. The ROW is intersected by several principal highways. By siting the new transmission line entirely within Eversource's existing ROW, adjacent to one or more existing overhead transmission lines, Eversource has taken great care to avoid, minimize, or mitigate adverse effects to environmental resources.

Although the new transmission lines will modify the visual character of the ROW, the long-term effect will be incremental because one or more overhead transmission lines

already are present on the ROW. Moreover, because of topography and vegetation, the new transmission line would be largely screened from view, and would be most apparent where the ROW crosses roads and trails. Distant views of the new transmission lines would generally be limited, though long views of the ROW are apparent from Black Rock Lake Dam and the eastern “yellow trail” crossing in the Northfield Brook Recreation Area. (*Eversource 1, Vol. 3, pp. 18-19*)

The construction will have negligible effects on topography and geology, and only minor, short-term, and highly localized impacts on soils. These effects would primarily occur in the vicinity of work sites along the ROW or where earth-moving activities, if any, are required for off-ROW Project support areas, such as off-ROW access roads and staging areas. Eversource will develop and implement a stormwater pollution control plan, pursuant to Connecticut Department of Energy and Environmental Protection (CT DEEP) requirements, to avoid or minimize the potential for erosion and sedimentation as a result of construction activities. (*PFOF ¶¶ 113, 116*)

The new 115-kV transmission line will span the 20 perennial and 38 intermittent streams that are presently spanned by Eversource’s existing transmission lines. To construct the new line, no temporary access will be required across the larger watercourses (i.e., Branch Brook, Northfield Brook, Naugatuck River); however, temporary access roads (e.g., consisting of timber mats, culverts, or equivalent) will be required across certain smaller watercourses. (*Eversource 4, pp. 14-15, 25; PFOF ¶ 122*)

Through diligent Project design and construction planning, the Project has been largely successful in avoiding permanent effects on wetlands. Of a total of 91 wetlands

along the Proposed Route, only 28 would be affected by temporary or permanent fill associated with the Project. In fact, based on the current line design, nine of the ten structures initially proposed for location in wetlands were shifted to upland locations. One of these structures could not be relocated; however, the proposed structure would result in permanent loss of approximately 28 square feet of emergent wetland. The resulting loss would not adversely affect the principal functions and values associated with this wetland, which extends across the ROW and cannot otherwise be avoided. (*Eversource 1, Vol. 1, pp. 3-8; 6-9 -6-11; Eversource 2, Q-CSC-011; Eversource 4, pp. 24-25; PFOF ¶ 127*)

In total, the Project will result in approximately 2.7 acres of temporary fill (construction matting) in wetlands and 0.04 acre of permanent fill (access road improvements and one structure foundation) in wetlands. (*Eversource 2, Q-CSC-011; PFOF ¶ 128*) To avoid or minimize adverse effects to wetlands, Eversource has attempted to locate new transmission line structures in upland areas wherever possible, and to place access roads outside of wetlands where practical. Further, Eversource will implement various best management practices and mitigation measures, as defined in its Application to the Council, to minimize disturbance to wetlands and watercourses during construction. (*Eversource 1, Vol. 1, pp. 6-8 to 6-9, 6-12 to 6-13*) Moreover, Eversource would coordinate with the involved regulatory agencies (e.g., CT DEEP, the U.S. Army Corps of Engineers [USACE]) to define appropriate compensatory mitigation for the Project's effects on water resources. Eversource anticipates that the in-lieu fee program

will be used in order to mitigate for unavoidable Project wetland impacts, as appropriate. (*Eversource 4, p. 37*)

Although the Proposed Route would traverse or be located near 21 vernal pools, no new transmission line structures will be located in any vernal pools. Further, Eversource has planned its construction activities to avoid or minimize impacts to vernal pools to the extent practical. In one vernal pool depression, temporary fill (matting) is proposed. Tree removal will be required in four other vernal pools. (*Eversource 4, pp. 28-29; PFOF ¶ 151-152*) To the extent possible, Eversource will limit effects to vernal pools from construction. (*Eversource 1, Vol. 1, pp. 6-21 – 6-22; Eversource 4, pp. 28-29*)

The new 115-kV transmission line will be aligned within Eversource's ROW across portions of designated recreational areas, including the Mattatuck State Forest, Veterans Memorial Park, Black Rock State Park, Northfield Brook Lake Recreation Area, areas along the Naugatuck River that are part of the Thomaston Dam Recreation Area, and various hiking trails (i.e., Jericho-Whitestone Connector Trail, Jericho Trail, Mattatuck Trail). (*Eversource 1, Vol. 1, pp. 5-37 to 5-40; Vol. 5, Ex. 1 and 2; Eversource 4, pp. 18-20; PFOF ¶ 165*) However, the new 115-kV transmission line would be consistent with the existing utility use of the ROW that already extends across these recreational areas, and thus would not result in significant adverse effects on the public use of such areas. Eversource would coordinate with the owners or managers of the recreational areas to develop measures to maintain public safety during construction,

while also avoiding short-term impacts to recreational uses. (*Eversource 1, Vol. 1, p. 6-35, CT DEEP letter; PFOF ¶ 166*)

All of the Project construction activities will be in compliance with two detailed Development and Management (“D&M”) Plans – one for the transmission line and one for the substation modifications – that Eversource will prepare in consultation with Council staff and subject to Council approval, after a Certificate is issued. To effectively monitor compliance, Eversource plans to retain engineering and environmental consultants to monitor the conformance of construction activities to the D&M Plans, the Council’s Certificate, other regulatory requirements, and Eversource standards. (*Eversource 1, Vol. 1, pp. 4-22 – 4-23; PFOF ¶¶ 190-191*)

In its comment letter to the Council dated February 29, 2016, CT DEEP recognized the rigorous process undertaken by Eversource to mitigate adverse effects to the areas within and surrounding the proposed transmission line. It stated, “The Eversource application is very detailed and comprehensive in terms of project description, justification and description of corridor resources.” Further, the agency approved the protection strategies listed in Eversource’s application for the five state-listed species potentially affected by the proposed transmission line.

The most significant long-term environmental effect of the construction and operation of the line will be the conversion of currently forested habitat to early successional types of habitat and shrub/scrub habitat by reason of expansion of the ROW. (*Eversource 4, p. 22*) Eversource estimates that approximately 48.9 acres, or 37%, of the 132 acres of forest vegetation currently within the ROW would be removed for the

Project. (*Eversource 4, p. 22*) However, the resulting conversion of such forested areas to shrub land, and the continued management thereof, will have a long-term positive effect on the various species that rely on this habitat type for food, cover, and nesting. In Connecticut, transmission corridors remain critical habitat for shrub land and other early-successional birds. (*Eversource 1, Vol. 1, pp. 6-16 – 6-17; Eversource 4, p. 27; PFOF ¶ 137*)

As noted by Ms. Mango in her testimony, the environmental effects of the Project do not conflict with the State of Connecticut’s environmental policies or land-use plans. (*Eversource 4, p. 29*) Furthermore, the Project is consistent with FERC’s “Guidelines for the Protection of Natural Historic Scenic and Recreational Values in the Design and Location of Rights-of-way and Transmission Facilities.” (*Admin. Notice 7*) Accordingly, it should be clear that the adverse environmental effects of the Project will be for the most part minor, localized, and short-term. Moreover, the Project will have significant long-term beneficial environmental effects. Given the importance to society of maintaining reliable electric service, such adverse impacts as the Project may have provide no reason to deny a certificate.

The Project ROW will be maintained in accordance with Eversource’s well-established vegetation management program, the objective of which is to maintain safe access to its transmission facilities and promote the growth of vegetative communities along its ROWs that are compatible with transmission line operation and in accordance with federal and state standards. Part of this program also includes invasive species management, including in wetland areas where such measures are carefully designed to

avoid adverse effects on any wetland. Special care will be taken to avoid or mitigate any effects on fisheries, amphibians, and breeding birds.

III. OVERHEAD CONSTRUCTION OF THE 115-kV TRANSMISSION LINE FROM FROST BRIDGE SUBSTATION TO CAMPVILLE SUBSTATION IS CONSISTENT WITH THE COUNCIL’S EMF BEST MANAGEMENT PRACTICES AND STATUTORY REQUIREMENTS

A. The Statutory and Regulatory Framework for Analyzing Construction of Electric Transmission Lines (Conn. Gen. Stats. § 16-50p(a)(3)(D)(i), (ii); § 16-50p(a)(3)(E); § 16-50t(c); Best Management Practices)

In December 2007, pursuant to Conn. Gen. Stats. § 16-50t(c) the Council adopted revised EMF Best Management Practices (“BMP”), following a two-year proceeding in which it considered, among other things, a comprehensive review of the scientific consensus concerning the potential health effects of transmission line electric and magnetic fields. The EMF BMP was revised in February 2014. (*Council Admin. Notice Item 29, Electric and Magnetic Field Best Management Practices for the Construction of Electric Transmission Lines in Connecticut, December 14, 2007, revised February 20, 2014. Website Link: <http://www.ct.gov/csc/emf-bmp>*) A copy is provided in Volume I of the Application, at p. 7A-1 *et seq.* The revised BMP, like its predecessor, apply to all transmission lines that require a certificate from the Council.

The Council requires an applicant proposing to build an overhead electric transmission line² to develop and present a Field Management Design Plan (FMDP) that

² The Project does include one short underground segment at Frost Bridge Substation. The new 115-kV line would exit the substation overhead to a transition structure immediately outside of the substation fence. The line would then transition to an underground configuration for approximately 0.1 mile. In this area, which is located entirely within Eversource property inside or directly adjacent to the substation fence, the 115-kV line will consist of a cross-linked polyethylene (XLPE) underground cable encased in a concrete

identifies design features to mitigate magnetic fields (MF) which would otherwise occur along an electric transmission ROW. Further, the BMP require transmission line applicants to adopt “no cost” line designs for lowering magnetic fields from new or reconstructed lines, and to identify “low cost” opportunities for making further reductions. Four percent of Project cost is the benchmark for “low cost” mitigation measures; and such measures should aim to achieve a 15% reduction at the edge of the utility ROW. However, the four percent guideline is not “absolute” but may be varied as appropriate to the circumstances of particular applications particularly where, as in this case, “no cost” field reduction strategies are shown to be effective. (*EMF BMP, App. Vol. 1, p. 7A-5; PFOF ¶ 201*)

The Council’s BMP also prescribe areas of focus for mitigation efforts in an applicant’s FMDP for any adjacent “residential areas, public or private schools, licensed child day-care facilities, licensed youth camps or public playgrounds”.

1. Eversource’s EMF calculations along the Proposed Route and in designated focus areas show that additional mitigation measures are not required.

Eversource has submitted a FMDP for the Project, which reflects that the proposed new transmission line between Frost Bridge Substation and Campville Substation has been designed so that it will have very little effect on magnetic field levels within and along the ROW. The Project’s base overhead design incorporates “no cost” magnetic field measures, including arrangement of conductors in a delta configuration

duct bank. Directly outside of the western fence line, the 115-kV underground line will transition to an overhead configuration via a second new transition structure. This design will minimize conflicts with existing overhead transmission lines and substation equipment at the substation. (*Eversource 1, Vol. I, pp. 2-13, 2-14*)

and arrangement of the phases of the new 115-kV line to achieve better cancellation with the magnetic field from the existing transmission lines on the ROW.

For its FMDP, Eversource worked on locating focus areas along the proposed route, per the Council's BMP. After a comprehensive search of available resources to locate these sites along the Proposed Route, Eversource determined that there are no schools, daycare facilities, youth camps, or "residential areas" (i.e., developed neighborhoods) adjacent to the ROW. However, the baseball field at Veteran's Memorial Park in Watertown, which is adjacent to the ROW, qualifies as a playground, and so was designated a Focus Area. In addition, Eversource identified two groups of homes near the transmission line route as focus areas³. Although measurements of EMF were taken at selected locations along the Proposed Route, Eversource specifically focused on these three areas in its FMDP when evaluating the need for and effectiveness of low-cost mitigation measures. (*PFOF* ¶¶ 202-204)

Focus Area A (Veteran's Memorial Park, Watertown)

Focus Area A extends into the Project's ROW; however, the cleared area of the park, where the baseball fields are located and where children tend to congregate, is approximately 300 feet from the proposed transmission line. Magnetic fields were calculated from the baseball fields' location. (*PFOF* ¶ 205)

³ Although these groups of homes did not comprise "residential areas", i.e. developed neighborhoods, they represented locations where people live nearby the ROW. Since the aim of the BMP is to reduce EMF exposure to the public, these areas were determined to be appropriate for analyzing the need for, and effectiveness of, low-cost mitigation measures.

The table below illustrates existing MF levels⁴, compared to estimated levels post-construction. It also contains an estimated post-construction level for an underground alternative line situated outside the ROW. When examining the concept of installing an underground transmission line instead of the proposed overhead line, the average annual magnetic fields at the baseball fields would see a 2.3% reduction. Not only is this reduction level well below the 15% target described in the Council’s BMP, but if a new underground line were constructed in a different location, it would introduce a new source of MF where constructed. The small effect of the proposed new line (0.06 mG) reflects the dominance of the already existing 345-kV circuit in the ROW. (PFOF ¶ 207)

Calculated Magnetic Fields at Focus Area A (Veteran’s Memorial Park)

Distance from Center of Transmission Line to Cleared Area of Baseball Fields at Veteran’s Memorial Park (ft)	Calculated Magnetic Fields (mG)		
	Existing Conditions	Post Construction	Post Construction of Underground Alternative Outside of ROW
300	2.99	3.05	2.98

Focus Area B (Walnut Hill Road, Thomaston)

Focus Area B runs perpendicular to the ROW corridor for the proposed transmission line. There are twelve residences located near a 1500-foot section of Walnut Hill Road along the Proposed Route. (PFOF ¶ 208)

⁴ Existing conditions reflect the loads projected for the year 2019, the first summer when the new line would be in service. The post construction conditions reflect the loads projected for 2024, five years after the line will have been in service. This is in keeping with the Council’s BMP.

The table below illustrates that the proposed transmission line would reduce the average annual MF at both edges of the ROW when compared to existing conditions. The “no-cost” phasing optimization allows for better cancellation between the existing line and proposed line. If an underground line were to be constructed off of the ROW, it would not achieve the same reduction as the overhead line; instead, it would introduce an additional source of MF wherever it was built. (PFOF ¶ 210)

Calculated Magnetic Fields at Focus Area B (Walnut Hill Road)

Section	Left Edge of ROW			Right Edge of ROW		
	Existing Conditions	Post Construction	Post Construction of Underground Alternative Outside of ROW	Existing Conditions	Post Construction	Post Construction of Underground Alternative Outside of ROW
Focus Area B (Walnut Hill Road)	7.23	4.23	4.69	6.12	3.92	3.95

Focus Area C (Campville Road, Litchfield)

Focus Area C is situated perpendicular to the ROW in which the proposed transmission line would be located. In this area, 19 residences are located near a 3500-foot section of Campville Road along the Proposed Route. (PFOF ¶ 211)

After examining EMF mitigation in this area, Eversource determined that the proposed transmission line would substantially reduce annual average magnetic fields at the west edge of the ROW. This reduction is primarily a result of the proposed Project and transmission line. While the east edge of the ROW would see a slight increase in

magnetic fields, the levels are still of a magnitude near background levels. The table below illustrates these findings. (PFOF ¶ 213)

Calculated Magnetic Fields at Focus Area C (Campville Road)

Calculated Magnetic Fields (mG)						
Section	Left Edge of ROW			Right Edge of ROW		
	Existing Conditions	Post Construction	Post Construction of Underground Alternative Outside of ROW	Existing Conditions	Post Construction	Post Construction of Underground Alternative Outside of ROW
Focus Area C (Campville Road)	20.54	12.82	13.28	0.55	1.43	0.42

Focus Area Summary

Based on the information presented above, Eversource believes that additional magnetic field mitigation measures at any of the three Focus Areas are not necessary in order to comply with the Council’s BMP. Because the proposed transmission line will result in either reductions or very small increases in magnetic fields at the right-of-way edges; additional “low cost” measures would not achieve substantial further reductions; and substantial reductions could not be implemented within the Council’s 4% of project cost guideline, mitigation measures in addition to those incorporated in the baseline design of the proposed transmission line are not appropriate for the Project. (PFOF ¶¶ 214, 216)

- The Existing ROW Will Provide an Adequate Buffer Zone for the New Overhead 115-kV Lines (§ 16-50p(a)(3)(D)(iii))***

Whether or not MF reduction strategies over and above the “no cost” strategies embedded in the base-line designs is adopted, the existing ROW will provide an adequate buffer zone for the new line. The ROW between the Frost Bridge Substation and the Campville Substation ranges from 250 to 400 feet wide. The line will be constructed in full compliance with the National Electrical Safety Code, published by the Institute of Electrical and Electronic Engineers. With respect to magnetic field levels, in evaluating whether an existing ROW provides an adequate buffer, the Council will consider, in addition to its own BMP, guidelines or benchmarks used by other states, such as the 85 mG Massachusetts benchmark for comparing different design alternatives. The edge-of-ROW magnetic field levels, regardless whether they are estimated with average or peak loads, will be comfortably within these guidelines. (*See e.g., Eversource 1, Vol. 1, Section 7, Appendix 7B*) The edge-of-ROW magnetic fields, estimated on an annual average load basis, will be toward the lower end of the range typically encountered in the vicinity of electric transmission lines. They will also be lower than those commonly encountered by the U.S. population near many electric distribution lines, and in everyday settings.

Accordingly, the Council has a clear basis for a finding that the new lines will be contained within a “buffer zone that protects the public health and safety,” consisting of the existing ROW, which will provide an adequate buffer zone between the new transmission line and any adjacent residential areas, public or private schools, licensed child day care facilities, licensed youth camps or public playgrounds. (*Conn. Gen. Stats. § 16-50p(a)(3)(D)(iii); Council Admin. Notice Item 11*)

IV. DISCUSSION OF CERTAIN ISSUES RAISED DURING THE HEARING & RELATED MATTERS

A. Requests for H-Frame Structures Along a Segment of the ROW in Thomaston

The Council received comments during both the MCF process and the public comment hearing from certain property owners in Thomaston requesting the use of H-frame structures along an approximately 1-mile segment of the ROW between new Structures 50 to 60, rather than the monopole design proposed in the Application. H-frame structures would be shorter and less visible than the proposed design. (Eversource 1, Vol. I, p. 12-9, 12-10; Tr. 3, March 1, 2016 6:30 p.m., pp. 88-91; 3/5/16 Correspondence to Council from Steven & Ann Dunsky).

The basis for Eversource's selection of the proposed configurations for the entire Project, including the use of monopoles in this particular 1-mile segment in Thomaston, is explained in detail in the Application. (Eversource 1, Vol. I, pp. 12-5 – 12-11.) Eversource determined that the use of H-frame structures in this portion of the ROW in Thomaston is feasible from a constructability standpoint. However, Eversource considers the proposed monopole structures to be preferable to H-frames for several reasons:

- The use of H-frame structures in this segment would result in greater environmental impacts because it would require the clearing of an additional 10 feet of predominantly forested vegetation along the eastern edge of the ROW in area, resulting in an additional clearing of approximately 1 acre of forested vegetation, including some clearing within wetlands and streams;

- The use of H-frame structures would increase the cost of the Project by approximately \$700,000;

(Eversource 1, Vol. 1, pp. 12-10, 12-11; Eversource 2; Q-CSC-018; PFOF ¶ 106) Based on the additional cost and other factors set forth above, Eversource does not believe the use of H-frame structures in this segment of the Project is warranted.

B. Maximizing the Utilization of the Existing ROW

During the hearing, Mr. Ashton asked Eversource representatives to ensure, during the preparation of the Development and Management Plan, that the proposed structures were designed in a manner that minimizes the spacing between the new and existing facilities on the ROW, with the goal of optimizing the availability of the ROW for future uses. (Tr. 2, March 1, 2016, 3:30 p.m. pp. 53-55) Eversource intends to carefully consider this issue in preparing the D&M Plan, and will apply the following guidelines in developing the designs included in the D&M Plan:

- The distance between the proposed structures and structures of adjacent (existing) transmission lines will be dictated by the structure configuration and the clearances required in Eversource's design standards. All new structures for the Project will be designed to be placed as close to existing transmission lines as possible, while maintaining Eversource conductor clearance standards.
- The proposed design will minimize the space within the ROW required to accommodate the existing line, will maintain a buffer along the eastern ROW edge, and will maximize the Eversource's future ability to install, if required, future circuits within the ROW, including the ability to construct an additional

115-kV or 345-kV circuit in the existing ROW without modifying the existing transmission lines.⁵

C. Reducing the Number of New Structures Needed to Separate the 1191 and 1921 Lines at the Naugatuck River Crossing

As described in the Application, Eversource is proposing to eliminate an existing 115-kV double circuit along a 0.4-mile segment of the ROW at the Naugatuck River crossing where the existing 1191 and 1921 115-kV lines are supported on a single set of lattice steel structures. Eversource proposes to remove the two existing lattice structures and to install four new monopole structures. (Eversource 1, Vol. I, p. 2-13, 2-14, 3-7) Eversource representatives were asked at the evidentiary hearing to comment on the feasibility of leaving the existing lattice towers in place to continue to support one of the existing 115-kV lines, and then transferring the other 115-kV line to a new set of structures, thereby reducing the number of new structures needed to accomplish the double-circuit separation from four structures to two structures. (Tr. 2, March 1, 2016, 3:30 p.m. pp. 67-69, 71-74)

The factors underlying Eversource's original proposal to remove and replace the existing lattice towers, and build four new monopole structures at the Naugatuck River crossing, include:

⁵ In preparing the D&M Plan, Eversource will consider whether the use of a vertical configuration in lieu of a delta configuration for cross sections 3 through 6 would be a cost-effective means for reducing the space required for the new line within the ROW. Based on evaluations performed to date, Eversource has determined that there would be material cost increases associated with the increase in structure heights and the number of drilled-shaft foundation structures that would be required to use a vertical configuration, with only small benefits in terms of minimizing the amount of the ROW used.

- Replacing this approximately 40-year old lattice towers now would avoid the need to re-access this extremely challenging section of ROW in the future to maintain or replace the towers (and the associated costs to redeploy the labor and materials needed to accomplish this work in the future);
- The proposed design is a more aesthetically pleasing solution since all structure types would be the same (tubular steel) instead of a mix of lattice and tubular steel.

(Tr. 2, March 1, 2016, 3:30 p.m. pp. 71-74) However, reducing the number of new structures at this location would reduce the construction footprint and the required construction time (Tr. 2, March 1, 2016, 3:30 p.m. pp. 67-68), and would save some material costs related to reducing the number of new structures and conductors.

If the Council determines that, on balance, the more cost effective and environmentally beneficial course would be to use the existing lattice tower to support one of the 115-kV circuits, rather than to replace the lattice tower now, Eversource will be able to construct the new line configuration accordingly.

D. Start of Construction Condition in Decision and Order.

The Council’s Decision and Orders approving new transmission lines typically include a condition that the Certificate Holder obtain necessary permits from the United States Army Corps and the Connecticut Department of Energy and Environmental Protection. In Docket NO. 370A, The Greater Springfield Reliability Project, the relevant condition provided that these permits be required “prior to the commencement of construction.” (*Council Administrative Notice Item 25, Decision and Order, Cond. 7*). In

order to meet in-service requirements, the Certificate Holder was required to petition the Council for relief from that condition, to allow construction to begin in areas for which approvals from CTDEEP and the USACE were not required. *See, Id.*, Notice of Permission to Start Work, d. June 3. 2011. To avoid a recurrence of this necessity, in Docket No. 424, the Interstate Reliability Project, the Council carefully tailored this condition to provide:

The Certificate Holder shall obtain necessary permits from the United States Army Corps of Engineers and the Connecticut Department of energy and Environmental Protection prior to the commencement of construction *in areas where said permits are required.* (emphasis added)
(*Council Administrative Notice Item 27, Decision and Order, Condition 7*).


By allowing construction to start in upland areas where permits from the USACE and CTDEEP were not required, this condition avoided unnecessary constraints on construction. The Applicant respectfully requests that the permitting condition in this Docket follow the same format as that in Docket 424, reproduced above.

CONCLUSION

Based upon the information set forth in its application, the Proposed Findings of Fact, and this brief, Eversource respectfully requests that the Council issue a certificate of environmental compatibility and public need for the Frost Bridge to Campville Project. Eversource further asks the Council to include in its Opinion the statutory findings that the Council is directed to make in order to support the issuance of the certificate. By way of reminder, these conclusory findings are listed in Appendix A to this brief.

Respectfully submitted,

**THE CONNECTICUT LIGHT AND
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NOTICE OF SERVICE

I hereby affirm that a copy of this Post-Hearing Brief was sent to each Party and Intervenor on the service list dated January 21, 2016, with method of service to each party and intervenor listed via e-mail and U.S. mail on March 24 2016.

Dated: March 24, 2016



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APPENDIX A

Statutory Findings

There is a public need for the Frost Bridge to Campville Project. (See Eversource's Proposed Findings of Fact [PFOF] ¶¶ 16-40, and provisions of the Record cited by those Findings.) CGS § 16-50p(a)(3)(A)

The nature of the probable environmental impact, including EMF, of the facility alone and cumulatively with other existing facilities has been reviewed by this Council in approving this facility. (See PFOF ¶¶ 112-220, and provisions of the Record cited by those Findings) CGS § 16-50p(a)(3)(B)

The Council has examined the policies of the State concerning the natural environment, ecological balance, public health and safety, air and water purity, and fish, aquaculture and wildlife, together with all other environmental concerns, and balanced the interests in accordance with CGS § 16-50p(a)(3)(B) and CGS § 16-50p(a)(3)(C). (See PFOF ¶¶ 112-220, and provisions of the Record cited by those Findings.)

The environmental effects that are the subject of CGS § 16-50p(a)(3)(B) can be sufficiently mitigated and do not overcome the public need for the facility approved by the Council in its Opinion, Decision and Order. (See PFOF ¶¶ 112-220, and provisions of the Record cited by those Findings.)

CGS § 16-50p(a)(3)(D)(i) requires that the Council specify what part, if any, of the facility approved shall be located overhead. That is designated in the Opinion, Decision and Order.

The facility approved by the Council in the Opinion, Decision and Order conforms to a long-range plan for expansion of the electric power grid of the electric systems serving the State of Connecticut and its people and interconnected utility systems and will serve the interests of electric system economy and reliability. (See PFOF ¶¶ 16-40 and provisions of the Record cited by those Findings.) CGS § 16-50p(a)(3)(D)(ii)

The overhead portions of the facility approved by this Council in its Opinion, Decision and Order are cost effective and the most appropriate based on a life-cycle cost analysis of the facility and underground alternatives to the facility and comply with the provisions of CGS § 16-50p. (See PFOF ¶¶ 78-98, and provisions of the Record cited by those Findings.) CGS § 16-50p(a)(3)(D)(iii)

The overhead portions of the facility approved by this Council in its Opinion, Decision and Order are consistent with the purposes of Chapter 227a of the General Statutes of Connecticut, and with Council regulations and standards adopted pursuant to CGS §16-50t, including the Council's BMPs and with the Federal Energy Regulatory Commission "Guidelines for the Protection of Natural Historic Scenic and Recreational Values in the Design and Location of Rights-of-Way and Transmission Facilities."(See Eversource 4,

pp. 29, 30; PFOF ¶¶ 112-93, and provisions of the Record cited by those Findings) CGS § 16-50p(a)(3)(D)(iii)

The overhead portions of the facility approved by this Council are contained within a buffer zone, no less in area than the existing right-of-way that provides a buffer zone that protects the public health and safety. In establishing this buffer zone, the Council took into consideration, among other things, residential areas, private or public schools, licensed child day care facilities, licensed youth camps or public playgrounds adjacent to the proposed overhead route of the overhead portions and the level of voltage of the overhead portions and any existing overhead transmission lines on the approved routes. (See PFOF ¶¶ 194-220 and provisions of the Record cited by those Findings) CGS § 16-50p(a)(3)(D)(iii)

Eversource has designed the Project in compliance with the Council's BMPs. (See PFOF ¶¶ 194-220, and provisions of the Record cited by those Findings.) (Eversource 1, Vol. 1, Section 7) CGS § 16-50p(a)(3)(D)(iii)

In compliance with the BMPs, Eversource furnished a Field Management Design Plan for the Project. (PFOF ¶ 220; Council Admin. Notice Item 11, pp. 4-5, Eversource 1, Vol. 1, Appendix 7B)

The location of the facility approved by this Council in its Opinion, Decision and Order will not pose an undue hazard to persons or property along the area traversed by those lines. (See PFOF ¶¶ 112-220, and provisions of the Record cited by those Findings;) CGS § 16-50p(a)(3)(E)

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